

# EXHIBIT 1

CAUSE NO. \_\_\_\_\_

<b>ERIC GOSS</b>	<b>§</b>	<b>IN THE DISTRICT COURT</b>
	<b>§</b>	
<b>VS</b>	<b>§</b>	<b>OF HARRIS COUNTY, TEXAS</b>
	<b>§</b>	
<b>BUREAU VERITAS NORTH AMERICA</b>	<b>§</b>	<b>_____ JUDICIAL DISTRICT</b>

**PLAINTIFF'S ORIGINAL PETITION**

NOW COMES Plaintiff Eric Goss, complaining of Defendant Bureau Veritas North America, and for cause of action would show the Court the following:

**Discovery Control Plan**

- As provided in Rule 190, Texas Rules of Civil Procedure, Plaintiff intends to conduct discovery under Level 2.

**Plaintiff**

- This Petition is filed by Eric Goss, Plaintiff, an individual whose address is 4323 Yellow Barberry Dr. Richmond, Texas 77406. The last three digits of Plaintiff's driver's license number are 668. The last three digits of Plaintiff's Social Security number are 349.

**Defendant**

- Defendant, Bureau Veritas North America, is an international company doing business in Texas and Defendant may be served with process by serving Anthony Bodamer its registered agent, by certified mail, return receipt requested, addressed to the registered office located at 10202 E. Freeway Ste. 222 Houston, Texas 77029 .

- This Court has jurisdiction over Bureau Veritas North America because said Defendant is a resident of Texas.

**Venue**

- Venue is proper in this county in that the events giving rise to this cause of action occurred within Harris County.

**Jurisdiction**

- The damages sought in this suit are within the jurisdictional limits of the Court. As required by Rule 47, Texas Rules of Civil Procedure, Plaintiff states that Plaintiff seeks monetary relief over \$1,000,000.

### **Facts**

Mr. Goss was employed by Bureau Veritas from 2016-2018. His position was procurement manager. While employed Mr. Goss never received an office. He was forced to work at a desk that was placed in the lobby. When he inquired about getting an office he was told that offices were designated for C-Suite employees. However, people hired subsequent to Mr. Goss at lesser positions were provided with offices. Furthermore, between November and December 2018 on at least 3 occasions Mr. Goss notified the liabilities the company faced to Bureau Veritas's Legal counsel, as well as Vice President of Airgas and the account manager. AirGas was supposed to divest from Bureau Veritas. Without doing so Bureau Veritas was in violation of Federal Trade Commission laws. They reportedly responded by notifying Mr. Goss that they were aware of the violations and potential liabilities. At a subsequent meeting with Bureau Veritas's legal counsel, Mr. Goss told reinforced counsel of the violations that were taking place and informed them of the need to address the issues of noncompliance in an attempt to protect the company from liability. Furthermore, Mr. Goss told them that Airgas threatened to remove all leased equipment out of the locations and discontinue service. In response Christina Arias, procurement manager, reportedly indicated that she would try and reach out to another person of authority at Airgas other than the employee Mr. Goss had spoken with. It resulted in the scheduling of a meeting amongst relevant Bureau Veritas employees without Mr. Goss. Mr. Goss was subsequently terminated as a direct result of his notification that Airgas- Bureau Veritas relationship was not in compliance with Federal Trade Commission regulations.

### **Causes of Action**

- Retaliation - Mr. Goss's was engaged in a protected activity by exposing and opposing Bureau Veritas Inc. illegal business transactions with AirGas. He was subsequently terminated for attempted to eradicate and correct what he prudently believed was illegal activity. The punishment was a direct result of Mr. Goss's reporting of the illegal activity as evidenced by the timing of his revelations and subsequent termination.

- Discrimination. Mr. Goss is a member of a protected class. Mr. Goss was discriminated against because of his race. Texas Labor Code chapter 21 protects individuals against employment discrimination on the basis of race

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**Attorney's Fees and Costs**

- Plaintiff requests judgment for reasonable attorney's fees and costs under Sections 37.009 and 38.001, Texas Civil Practice and Remedies Code.

**Jury Demand**

- Plaintiff hereby requests a jury trial.

**Request for Disclosure**

- As provided in Rule 194, Texas Rules of Civil Procedure, Plaintiff requests disclosure of all items listed in Rule 194.2, Texas Rules of Civil Procedure.

**Prayer**

Plaintiff prays that citation be issued commanding Defendant to appear and answer herein and that Plaintiff be awarded judgment against Defendant for actual damages, pre-judgment interest, post-judgment interest, costs of Court and for all other relief to which Plaintiff is entitled both in equity and at law.

Respectfully submitted,

/s/ Darian L. Conston

Darian Conston

Attorney for: Plaintiff

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I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this August 9, 2021

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Marilyn Burgess, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

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